

EXHIBIT A

[DATE]

NOTICE TO POTENTIAL COLLECTIVE ACTION PLAINTIFFS

AUTHORIZED BY JUDGE AARON POLSTER

TO: All current and formerly hourly employees who worked for PCC Airfoils LLC (“PCC Airfoils”) at PCC Airfoils Mentor and SMP facilities during the period of August 31, 2016 to April 1, 2019 and who (1) received shift differentials, and (2) worked overtime in the period in which they earned such shift differentials.

All current and formerly hourly employees who worked forty (40) or more hours in any workweek for PCC Airfoils at its Ceramics, Crooksville, Douglas GA, Mentor, Mold Masters, and SMP facilities during the period of August 31, 2016 and the present.

RE: Your right to join a collective action seeking to recover alleged unpaid overtime compensation.

1. PURPOSE OF THIS NOTICE

The purpose of this Notice is to inform you of a collective action lawsuit in which you are potentially “similarly situated” to the Named Plaintiff, Stephen Cottrell, to advise you of how your rights under the Fair Labor Standards Act (“FLSA”) may be affected by this action, and to inform you of the procedure to participate in this lawsuit if you choose to do so.

2. DESCRIPTION OF THE ACTION

On May 8, 2019, a lawsuit was filed in the United States District Court for the Northern District of Ohio, Case No. 1:19-cv-1036. The action was filed on behalf of the Named Plaintiff Stephen Cottrell and all other similarly-situated individuals. The Defendant in this lawsuit is PCC Airfoils.

The lawsuit alleges that PCC Airfoils violated the FLSA by not paying its hourly employees all of their overtime compensation. The lawsuit concerns the following two groups of PCC Airfoils current and/or former employees:

All current and formerly hourly employees who worked for PCC Airfoils at PCC Airfoils’ Mentor and SMP facilities during the period of August 31, 2016 and April 1, 2019 and who (1) received shift differentials, and (2) worked overtime in the period in which they earned such shift differentials.

All current and formerly hourly employees who worked forty (40) or more hours in any workweek for PCC Airfoils' Ceramics, Crooksville, Douglas GA, Mentor, Mold Masters, and SMP facilities during the period of August 31, 2016, and the present.

With respect to the first group, the lawsuit alleges that PCC Airfoils did not include employees' shift differentials when paying overtime and thereby paid employees at a lower overtime rate than they should have been paid. For the second group, the lawsuit alleges that employees arrived and began working prior to the scheduled start of their shifts, but they were not compensated for the time spent working on-the-clock prior to the scheduled start of their shifts.

You are receiving this Notice because according to the records of PCC Airfoils, you fit the definition of the class of individuals listed above and may be eligible to participate in this action.

PCC Airfoils denies the claims alleged in the lawsuit and is committed to complying with all federal, state and local wage and hour laws.

This lawsuit is still in its early stages. The Court has not yet decided whether Plaintiff or PCC Airfoils is correct. The right to recover wages for any Plaintiff has not been considered, established or determined by the Court.

3. YOUR RIGHT TO PARTICIPATE IN THIS ACTION

Plaintiff seeks unpaid wages not only for himself but also for other persons with whom he maintains are similarly situated. Plaintiff alleges that those individuals consist of the two groups of current and former PCC Airfoils employees defined in Section 2 above. If you fit the definition of one or both of the two classes of employees defined above, you have the right to participate in this lawsuit.

4. HOW TO PARTICIPATE IN THIS ACTION

To join this collective action, you must sign and return the enclosed "Consent Form." This process is being administered by a third-party. If you choose to join this action, you must return the Consent Form by: (a) mailing it to [insert TPA mailing address], (b) faxing the form to [insert TPA fax], or (c) scanning the form and emailing it to [insert TPA email].

The signed Consent Form must be postmarked, faxed or emailed by 60 days from date of mailing. If you wish to join this collective action, please return the Consent Form as soon as possible because the time period for which you can seek payment for your overtime compensation will depend on when this form is filed with the Court. If you lose or misplace the enclosed Consent Form, or if you have any questions about how to fill-out the Consent Form, you may contact [insert TPA name and telephone number].

5. NO RETALIATION PERMITTED

The law prohibits PCC Airfoils, or any of its agents or employees, to discharge you, or in any manner harass, discriminate or retaliate against you for taking part in this action.

6. EFFECT OF JOINING THIS ACTION

If you choose to join this action, you will be bound by the judgment, whether it is favorable or unfavorable. You will also be bound by, and will share in, any settlement that may be reached on behalf of the class. Employees of PCC Airfoils' Mold Masters facility will be limited in their recovery, if any, to the period beginning February 22, 2018 instead of August 31, 2016.

By joining this action, you designate the named Plaintiff, Stephen Cottrell, as your agent to make decisions on your behalf concerning the litigation, the method and manner of conducting this litigation, the entering of an agreement with Plaintiff's Counsel concerning fees and costs and all other matters pertaining to this action.

7. NO LEGAL EFFECT OF NOT JOINING THIS ACTION

If you choose not to join this action, or do not return the Consent Form, you will not be affected by any judgment or settlement rendered in this case, whether favorable or unfavorable to the class. You will not be entitled to share any amounts recovered by the class. You will be free to file your own lawsuit, or to not file any lawsuit at all; however, the pendency of this action will not stop the running of the statute of limitations as to any claims you may have until you file your own lawsuit.

8. YOUR LEGAL REPRESENTATION IF YOU JOIN

If you participate in this action, and do not retain your own counsel, you will be represented by the following attorneys from the law firms **Nilges Draher, LLC** and **Coffman Legal, LLC**:

Matthew J.P. Coffman
Coffman Legal, LLC
1550 Old Henderson Road
Suite 126
Columbus, Ohio 43220
(614) 949-1181 (telephone)
(614) 386-9964 (facsimile)
mcoffman@mcoffmanlegal.com

Shannon M. Draher
Hans A. Nilges
Nilges Draher, LLC
7266 Portage Street, N.W., Suite D
Massillon, OH 44646
(330) 470-4428 (telephone)
(330) 754-1430 (facsimile)
sdraher@ohlaborlaw.com
hans@ohlaborlaw.com

9. PCC AIRFOILS IS REPRESENTED BY:

John Gerak
Monica L. Lacks
Ogletree, Deakins, Nash, Smoak, & Stewart, P.C.
127 Public Square, Suite 4100
Cleveland, Ohio 44114
(216) 241-6100 (telephone)
(216) 357-4733 (facsimile)
john.gerak@ogletreedeakins.com
monica.lacks@ogletreedeakins.com

10. FURTHER INFORMATION:

Further information about this Notice of the action may be obtained from Plaintiff's counsel – Shannon Draher at (330) 470-4428 or Matthew Coffman at (614) 949-1181. The call to Plaintiff's Counsel is free and confidential.

**THE COURT HAS TAKEN NO POSITION IN THIS CASE REGARDING THE MERITS
OF PLAINTIFF'S CLAIMS OR OF PCC AIRFOILS' DEFENSES**

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

STEPHEN COTTRELL, on behalf of himself and others similarly situated,)	
)	Case No. 1:19-Cv-01036-DAP
)	
Plaintiff,)	Judge Dan Aaron Polster
)	
vs.)	
)	
)	
PCC AIRFOILS, INC,)	
)	
Defendant.)	

I hereby consent, agree, and opt-in to be a party Plaintiff in the above-captioned collective action. I agree to be represented by Nilges Draher, LLC and Coffman Legal, LLC. I understand that by filing this consent, I will be bound by any settlement or judgment of the Court on all issues in this case.

Full Name (Print clearly)

Signature/Date

(Information below this line will not be filed with the Court)

Street Address

City/State/Zip

Telephone Number

Email Address:

FAX to: settlement administrator;

EMAIL to: settlement administrator; or

MAIL to: settlement administrator

On or before: [60 days from mailing]

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